THE LAW OFFICES OF RICHARD J. CORBI PLLC
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1501 Broadway, 12th Floor New York, New York 10036

Tel: (646) 571-2033

Email: rcorbi@corbilaw.com

Richard J. Corbi

Counsel	for	

UNITED STATES BANKRUPTCY COURT	ľ
SOUTHERN DISTRICT OF NEW YORK	
	$\mathbf{Y}$

In re:

: Chapter 11

Genesis Global Holdco, LLC, et al.,
: Case No. 23-10063 (SHL)

Debtors. : (Jointly Administered)

## RESERVATION OF RIGHTS OF TO NOTICE OF FILING OF PLAN SUPPLEMENT FOR THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN

by and through its undersigned counsel, respectfully submits this reservation of rights ("ROR") to the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), Notice of Filing Plan Supplement for the Debtors' Amended Joint Chapter 11 Plan (the "Setoff Plan Supplement") (Doc. No. 1144). In support of this ROR, respectfully states as follows:

- 1. The Debtors' Setoff Plan Supplement details the setoff principles for allowed claims against the Debtors as well a schedule of claims subject to the setoff principles.
- 2. is identified as claim number 351 and schedule F number GGC 3.1.0104 on Exhibit 1 to the Setoff Plan Supplement. While

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10003.

the setoff principles contained in Setoff Plan Supplement, reserves its rights to the extent the Setoff Plan Supplement seeks to adjudicate Chainview's claim pursuant to Rule 3007 of the Federal Rules of Bankruptcy Procedure in the event the Setoff Plan Supplement is not approved by this Court.

Dated: February 5, 2024 New York, New York

## THE LAW OFFICES OF RICHARD J. CORBI PLLC

By: /s/ Richard J. Corbi Richard J. Corbi

1501 Broadway, 12<sup>th</sup> Floor New York, New York 10036 Telephone: (646) 571-2033 Email: rcorbi@corbilaw.com

Counsel for

## **Certificate of Service**

I certify that on February 5, 2024, I caused a copy of the foregoing document to be served by Electronic Case Filings System for the United States Bankruptcy Court for the Southern District of New York.

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By: /s/ Richard J. Corbi

Richard J. Corbi 1501 Broadway, 12<sup>th</sup> Floor New York, New York 10036 Telephone: (646) 571-2033

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